

# EXHIBIT N

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13 and Divya Narendra  
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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,  
TYLER WINKLEVOSS, HOWARD  
WINKLEVOSS, DIVYA NARENDRA, AND  
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**DECLARATION OF CONNECTU LLC**

1 I, Cameron Winklevoss am a member of and currently on the Board of Managers of  
2 ConnectU LLC. I make this declaration in response to the Court's Order, dated February 17, 2006.

3 On behalf of ConnectU, I was responsible for reviewing and drafting the responses to  
4 Plaintiff The FaceBook Inc.'s First Set of Requests for Production of Documents ("Discovery"). I  
5 am the ConnectU representative regarding this Discovery. I have made a diligent search and  
6 reasonable inquiry for the purpose of locating documents responsive to this Discovery and have  
7 forwarded such documents to my counsel. My specific responses to the Requests are as follows:

8 1. Regarding Request No. 1, after a diligent search, no such documents exist.

9 2. Regarding Request No. 2, I understand that discovery requests concerning  
10 ConnectU users has been denied.

11 3. Regarding Request No. 3, after a diligent search, no such documents exist.

12 4. Regarding Request No. 4, after a diligent search, no such documents exist.

13 5. Regarding Request No. 5, after a diligent search, no such documents exist.

14 6. Regarding Request No. 6, after a diligent search all documents regarding the  
15 organizational structure of ConnectU were previously produced in the Massachusetts litigation.

16 Their production numbers are: C002825-31; C004101; C004562-67; C006789-90; C006818;  
17 C008043; C009718; C011104; C011105; C011106; C011107; C011108; C011109; C011110;  
18 C011111; C011112; C011113; C011114; C011115; C011116; C011117; C011144-89; C011190-  
19 236; C011237-84; C011285-335; C011336; and C011337. There are no documents that relate to  
20 both the Winklevoss Companies and ConnectU.

21 7. Regarding Request No. 7, after a diligent search all corporate records  
22 concerning ConnectU were previously produced in the Massachusetts litigation. Their production  
23 numbers are: C002825-31; C004101; C004562-67; C006789-90; C006818; C008043; C009718;  
24 C011104; C011105; C011106; C011107; C011108; C011109; C011110; C011111; C011112;  
25 C011113; C011114; C011115; C011116; C011117; C011144-89; C011190-236; C011237-84;  
26 C011285-335; C011336; and C011337. There are no documents that relate to both the Winklevoss  
27 Companies and ConnectU.  
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1           8.       Regarding Request No. 8, after a diligent search there are no financial reports,  
2 profit/loss statements or loan documents concerning ConnectU. There are no documents that relate  
3 to both the Winklevoss Companies and ConnectU.

4           9.       Regarding Request No. 9, after a diligent search all documents regarding the  
5 communications between ConnectU and companies or persons in California, ConnectU states that it  
6 cannot confirm whether any such communications occurred. In the Massachusetts litigation,  
7 ConnectU produced copies of many communications, mostly in the form of e-mails that reflected a  
8 recipient or sender who identified a California address and/or telephone number. Their production  
9 numbers are: C003883-84; C004511; C004515-16; C006379; C006488; C006493-532; C006633-  
10 34; C006722-25; C006733-35; C006741-46; C006750; C006782-84; C006973; C007123-27;  
11 C007129-30; C007137; C007375-78; C007393-94; C007403; C007488-89; C008544-45; C008676-  
12 77; C008872-73; C008948-51; C008990-92; C008996-98; C009000-02; C009007-09; C009011-25;  
13 C009168-69; C009386; C009389-90; C009395-96; C009403-08; C009613; C010181; C010325-26;  
14 C010368-70; C010639; C010643; C010662; C010664; C010667; and C010710-11. In this  
15 litigation, ConnectU has produced copies of all remaining communications that reflected a recipient  
16 or sender who identified a California address and/or telephone number. Their production numbers  
17 are CUCA00001 - CACU000227.

18           10.      Regarding Request No. 10, I understand that discovery requests concerning  
19 ConnectU users has been denied.

20           11.      Regarding Request No. 11, after a diligent search, ConnectU does not have  
21 any account receivable due from a California resident.

22           12.      Regarding Request No. 12, after a diligent search, ConnectU does not have  
23 any personal or real property in California.

24           13.      Regarding Request No. 13, after a diligent search, ConnectU does not have  
25 any contracts in which California law governs.

26           14.      Regarding Request No. 14, while the word "access" is vague and uncertain,  
27 after a diligent search, ConnectU has produced in the Massachusetts litigation all known documents  
28 it believes are responsive to this request. The production numbers of these documents are:

C003282; C004043; C004225; C004235; C004243; C006535-36; C006537; C006538-40; C006711-12; C008023; C008531; C008657; C008658; C008669; C008670; C008673; C008674; C008675; C008691; C008810; C008811-19; C008835; C008848; C008954; C008957; C008959; C008962; C008963; C008964-65; C009611-12; C010359; C010360-63; C010364; C010365; C010446; C010447; C010448; C011005; C011038; C011039-40; C011093; and C011097.

15. Regarding Request No. 15, after a diligent search, ConnectU hereby produces documents that are bates stamped CUCA00228 - CUCA02960.

16. Regarding Request No. 16, after a diligent search, ConnectU does not have any licenses or registrations regarding the ability to do business in California.

17. Regarding Request No. 17, I understand that discovery requests concerning ConnectU users has been denied.

18. Regarding Request No. 18, after a diligent search, all formation records of ConnectU were previously produced in the Massachusetts litigation. Their production numbers are: C002825-31; C004101; C004562-67; C006789-90; C006818; C008043; C009718; C011104; C011105; C011106; C011107; C011108; C011109; C011110; C011111; C011112; C011113; C011114; C011115; C011116; C011117; C011144-89; C011190-236; C011237-84; C011285-335; C011336; and C011337.

19. Regarding Request No. 19, after a diligent search, all documents concerning ConnectU's directors, officers, employees and agents as their activities concerned ConnectU were previously produced in the Massachusetts litigation. Their production numbers are: C002825-31; C004101; C004562-67; C006789-90; C006818; C008043; C009718; C011104; C011105; C011106; C011107; C011108; C011109; C011110; C011111; C011112; C011113; C011114; C011115; C011116; C011117; C011144-89; C011190-236; C011237-84; C011285-335; C011336; and C011337.

20. Regarding Request No. 20, after a diligent search, ConnectU produced copies of many documents that might reflect marketing activities in California. Their production numbers are: C003883-84; C004515-16; C006973; C007137; C007403; C008544; C008948-51; C009011-25; C009168-69; C009389; C010368-70; C010639; C010662; and C010664. In this litigation,

1 ConnectU has produced copies of all remaining communications that might reflect marketing  
2 activities in California. Their production numbers are CUCA00001 - CACU000227.

3           21.     Regarding Request No. 21, after a diligent search for all documents regarding  
4 California people or entities with whom ConnectU had a relationship, ConnectU states that it cannot  
5 confirm whether any such relationship existed. In the Massachusetts litigation, ConnectU produced  
6 copies of many communications, mostly in the form of e-mails that reflected a recipient or sender  
7 who identified a California address and/or telephone number. Their production numbers are:  
8 C003883-84; C004511; C004515-16; C006379; C006488; C006493-532; C006633-34; C006722-25;  
9 C006733-35; C006741-46; C006750; C006782-84; C006973; C007123-27; C007129-30; C007137;  
10 C007375-78; C007393-94; C007403; C007488-89; C008544-45; C008676-77; C008872-73;  
11 C008948-51; C008990-92; C008996-98; C009000-02; C009007-09; C009011-25; C009168-69;  
12 C009386; C009389-90; C009395-96; C009403-08; C009613; C010181; C010325-26; C010368-70;  
13 C010639; C010643; C010662; C010664; C010667; and C010710-11. In this litigation, ConnectU  
14 has produced copies of all remaining communications that reflected a recipient or sender who  
15 identified a California address and/or telephone number. Their production numbers are  
16 CUCA00001 - CACU000227.

17           22.     Regarding Request No. 22, after a diligent search, all documents concerning  
18 the ownership and investments in and of ConnectU were produced in the Massachusetts litigation.  
19 Their production numbers are: C002858-59; C004101; C006773; C006789-90; C008548; C009661;  
20 C009662; C010168-69; C010173; C010174-75; C010246; C010291-92; C010296; C010308;  
21 C010314; C011144-89; C011190-236; C011237-84; C011285-335; C011336; and C011337.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on the 3 day of March, 2006.

  
Cameron Winklevoss